

March 2, 2017

VIA ECFS

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

Re: *Applications of AT&T Inc. and DIRECTV for Consent To Assign or Transfer Control of Licenses and Authorizations*, MB Docket No. 14-90
REDACTED—FOR PUBLIC INSPECTION

Dear Ms. Dortch:

Pursuant to the *Second Amended Modified Joint Protective Order*, Appendix B of the Commission's Memorandum Opinion and Order ("Appendix B"), and the methodology for the reporting of internet interconnection performance metrics developed by the Independent Measurement Expert ("Methodology") in the above-referenced proceeding,¹ AT&T Inc. (together with its subsidiaries and affiliates, "AT&T") is submitting one copy of a CD-ROM containing the *unredacted* Highly Confidential Report on Internet Interconnection Performance Metrics for the period of January 1 to January 31, 2016.

After consultation with Commission staff, AT&T is reporting monthly data using an alternative measurement from that specified in the Methodology for its Content Interconnect Platform ("CIP") service.² AT&T's CIP solution has a significantly different architecture from

¹ *Applications of AT&T Inc. and DIRECTV for Consent To Assign or Transfer Control of Licenses and Authorizations*, MB Dkt No. 14-90, Second Amended Modified Joint Protective Order, DA 14-1640 (MB rel. Nov. 12, 2014); *Applications of AT&T Inc. and DIRECTV for Consent To Assign or Transfer Control of Licenses and Authorizations*, Memorandum Opinion and Order, FCC 15-94, App. B §§ V, VII.5 (rel. July 28, 2015); *First Amended Report of AT&T Independent Measurement Expert: Reporting Requirements and Measurement Methods*, dated June 28, 2016, MB Dkt No. 14-90 (filed Aug. 4, 2016).

² CIP service allows customers to collocate cache servers in AT&T's network at locations closer to the AT&T end users who will be accessing the content on those servers. CIP customers purchase the space, power, cooling, transport, and other capabilities needed to operate their servers in AT&T's network.

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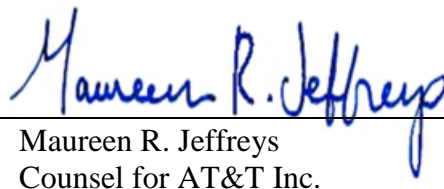
that of its internet peering and managed internet service (“MIS”) architectures. The development, testing, and certification of the Methodology was focused on internet peers and on-net only MIS customers, and does not carry over to the CIP architecture and equipment.

Accordingly, for each interconnection point between the Content Delivery Network customer (“CDN”) and the AT&T network for which the CDN is using AT&T’s CIP service, AT&T is providing 5 minute measurements of utilization, broken out into categories of the destination of the traffic (*i.e.*, local, metro, regional, national). This alternative measurement includes additional information above the utilization information reported for other interconnection parties, which would not be broken out by categories of the destination of the traffic. However, it does not include latency or packet loss, which would require additional instrumentation. Such additional instrumentation would be unique to the CIP service, since it uses a different network topology than that used with the other interconnection parties covered by Appendix B and the Methodology.

AT&T hereby requests Highly Confidential treatment of this submission. Separately, AT&T is submitting a redacted public version of this filing via ECFS and unredacted copies to the Commission Staff.

Please contact me at (202) 942-6608 or Maureen.Jeffreys@aporter.com if you have any questions. Thank you for your assistance.

Respectfully submitted,



Maureen R. Jeffreys
Counsel for AT&T Inc.

Enclosure (Withheld as Highly Confidential)

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